IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION NO. 7:23-CV-897

MOTION FOR LEAVE TO FILE
MANUALLY—PURSUANT TO
LOCAL RULE 5.1(F)(1) AND
ELECTRONIC CASE FILING
ADMINISTRATIVE POLICIES
AND PROCEDURES MANUAL
(V)(A)(2)(B)

Pursuant to Local Rule 5.1(f)(1) and Electronic Case Filing Administrative Policies and Procedure Manual (V)(A)(2)(B), the United States respectfully seeks permission to file manually an exhibit to D.E. 362. **Exhibit 24**, Video of Mar. 10, 2025 "Oral History" of Jerome Ensminger and Mike Partain, is not capable of being filed electronically because it contains a video file. In accordance with the Federal Information Security Modernization Act of 2014, the Department of Justice would like to provide this file to the Court on an encrypted DVD or drive. *See* Pub. L. No. 113–283; §§ 3551–3558, 128 Stat. 3073, 3073-3088. The United States' Proposed Order is attached as Exhibit 1.

[Signature page to follow.]

Dated: April 29, 2025 Respectfully submitted,

> YAAKOV ROTH Acting Assistant Attorney General, Civil Division

JONATHAN GUYNN Deputy Assistant Attorney General, Torts Branch

J. PATRICK GLYNN Director, **Environmental Torts Litigation Section**

BRIDGET BAILEY LIPSCOMB Chief, Camp Lejeune Unit

ADAM BAIN Special Litigation Counsel

HANLEY GIBBONS SARA MIRSKY SHARON SPRAYREGEN Trial Attorneys

/s/ Cindy M. Hurt CINDY M. HURT Trial Attorney United States Department of Justice Civil Division, Torts Branch **Environmental Torts Litigation** 1100 L Street, NW Washington, DC 20005 (202) 307-5788 Fax (202) 616-4473 Cindy.M.Hurt@usdoj.gov Virginia Bar No. 86826

Attorney inquiries to DOJ regarding CLJA: (202) 353-4426

Attorneys for Defendant, United States of America

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2025, I electronically filed the foregoing using the Court's Electronic Case Filing system, which will send notice to all counsel of record.

/s/ Cindy M. Hurt CINDY M. HURT